

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants,

v.

VIRGINIA HOUSE OF DELEGATES, *et al.*,

Intervenor-Defendants.

Civil Action No. 3:14-cv-00852-REP-GBL-
BMK

SECOND DECLARATION OF KEVIN J. HAMILTON

I, Kevin J. Hamilton, state that I have personal knowledge of the matters set forth in this declaration and, if sworn as a witness, would testify as follows:

1. I am an attorney practicing at the firm of Perkins Coie LLP and served as a lead counsel for the plaintiffs in this matter. I submit this second declaration in support of Plaintiffs' Second Motion for Attorneys' Fees and Litigation Expenses ("Second Fee Motion").

2. Plaintiffs were represented in this matter by attorneys from the firm of Perkins Coie LLP.

3. In their opposition to the Second Fee Motion, the State Defendants indicate that they do not object to Plaintiffs recovering fees related to work performed after July 19, 2018 that relates solely to the remedial proceedings before this Court, but do object to recovery of fees

related to appeals to the Supreme Court by the Defendant-Intervenors. Plaintiffs have submitted detailed time entries as Appendix A to Plaintiffs' reply, which were compiled from contemporaneously created time records maintained by Plaintiffs' counsel, isolating specific time entries that relate solely to work concerning to the remedial proceedings before this Court.

4. In conjunction with their reply in support of their Second Fee Motion, Plaintiffs seek recovery for work performed between June 17, 2018, through the present, related to preparation of Plaintiffs' fee petition and cost bill. After exercising billing discretion, Plaintiffs request recovery for a total of 54.80 hours and \$32,785 in fees for work in preparing the current fee petition and cost bill and reply brief. These time entries are attached as Appendix B to this reply. Appendix B was compiled from contemporaneously created time records maintained by Plaintiffs' counsel, isolating the total number of hours for which Plaintiffs seek fees for each timekeeper, and reflecting both the actual rates charged and the local "Richmond" rate for each timekeeper.

5. I further certify that the work performed, and expenses and costs incurred, was reasonably necessary to the preparation and presentation of the fee petition and supporting materials.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed this 5th day of September, 2019 in Seattle, Washington



Kevin J. Hamilton

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of September, 2019, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

By /s/ Aria C. Branch

Aria C. Branch (VSB #83682)

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